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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA) No. CR 13-cr 93 JST
14)
15 v.) JOINT STIPULATION REGARDING
16 JONATHAN MOTA,) PROVISION OF DISCOVERY AND
17 Defendant.) ~~PROPOSED~~ PROTECTIVE ORDER
18 _____)

19 The United States, through its counsel of record ("the Government"), and defendant
20 Jonathan Mota, by and through his counsel of record, hereby agree and stipulate that the
21 Government has and will continue to provide discovery on the following conditions set forth
22 below. The reason for this stipulation is that some of the discovery in this case contains sensitive
23 information, to include for example third party telephone information and bank account
24 information of witnesses or associated parties. Documents containing any telephone number,
25 social security number/taxpayer identification number, or financial account numbers, or date of
26 birth or home address, or names of minor children of any person that are produced in this matter
27 are deemed Protected Material. Possession of copies of the Protected Material is limited to the
28 defendant, his attorney of record, and investigators, paralegals, law clerks, translators,

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

interpreters, experts and assistants for the attorneys of record (hereinafter collectively referred to
as "members of the defense team").

The defendant, his attorney of record, and members of the defense team acknowledge that providing copies of the Protected Material to other persons is prohibited, and agree not to duplicate or provide copies of the Protected Material to other persons. The defendant, his attorney of record, and members of the defense team may show Protected Material to witnesses or prospective witnesses in conjunction with their defense of the defendant in this case. The defendant, his attorneys of record, and members of the defense team further acknowledge that they are prohibited from using the Protected Material for any purpose other than defending the defendants in the above-captioned matter. Any violation of these prohibitions constitutes a violation of the Protective Order. Further, the attorneys of record agree that prior to disseminating any copies of the Protected Material to members of the defense team, they will provide a copy of this Protective Order to members of the defense team.

The parties acknowledge their redaction responsibilities before the public filing of any documents and, in compliance with Fed. R. Crim. P. 49.1, each signatory agrees to redact social Security or taxpayer-identification numbers, financial account numbers, dates of birth, names of minor children and home addresses.

SO STIPULATED.

DATED: August 6, 2013

/s/
KATHRYN R. HAUN
Assistant United States Attorney

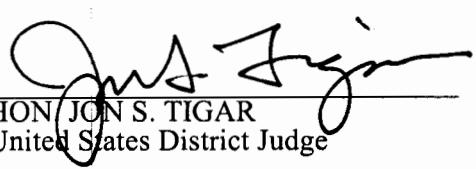
/s/
RICHARD MAZER
Attorney for Jonathan Mota

PROPOSED ORDER

The Court finds appropriate the parties' stipulation with respect to the provision of discovery in this case. Accordingly, it is hereby ORDERED that discovery will be produced and handled in accordance with the terms outlined in the "Joint Stipulation Regarding Provision of Discovery."

IT IS SO ORDERED.

DATED: 8/7/13


HON. JON S. TIGAR
United States District Judge